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October 18, 2024

**VIA ECF**

The Honorable George C. Hanks, Jr.  
United States District Judge  
United States Courthouse  
515 Rusk Street, Room 6206  
Houston, Texas 77002

Re: *In re Alta Mesa Resources, Inc. Securities Litigation*,  
Case No. 4:19-cv-00957 (S.D. Tex.)

Dear Judge Hanks:

Yesterday the remaining Defendants wrote to Your Honor seeking a further delay of the trial date and the date for pre-trial filings on the basis of certain settlements involving the Individual Action Plaintiffs ("IAPs"). Dkt. No. 853. Class Plaintiffs opposed that request. Dkt. No. 855. Twenty-four hours later, having received no response from the Court to their request, counsel for Alta Mesa, Riverstone, and the remaining individual Defendants have submitted another request to delay the trial (Dkt. 857), this time based on an injury to one of their counsel, Andrew Clubok.

While it is not mentioned in today's letter to the Court, we understand, from calls with Mr. Clubok, that he tore his meniscus a week or two ago. While we certainly hope Mr. Clubok's knee recovers quickly, he is just one of a dozen lawyers on the trial team from Latham & Watkins, a firm that touts that it has over 3,500 lawyers. And while Mr. Clubok is an experienced lawyer, he joined the Latham & Watkins team litigating this five-year old securities litigation just two months ago (Dkt. No. 803), *after* the case was already supposed to have gone to trial. In this regard, it will not be lost on the Court that the rest of the Latham & Watkins trial team, which has been led for five years by Attorney in Charge Christian Word, is also exceptionally experienced and capable. It is difficult to imagine under the circumstances that Mr. Word and the rest of the Latham & Watkins team that have lived this case for five years, doing all of the discovery, arguing every motion, and handling every conference with the Court, cannot try the case beginning as scheduled on November 4, 2024.

Separately, as we pointed out in our letter yesterday (Dkt. No. 855): (i) adjusting the JPTO and other pre-trial submissions to accommodate settlement with any party is a relatively straightforward task that will not delay the pre-trial submissions due on October 21, 2024; (ii) finalizing the settlements agreed to between the IAPs and Defendants is irrelevant to the pre-trial submissions and trial of the Class claims against the remaining Defendants; and (iii) Class Plaintiffs already have a truck with trial-related materials and staff on the way to Houston, some attorneys for the Class Plaintiffs have already traveled to or are in transit to Houston, room blocks

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are in place and paid for (and there is no guarantee the hotel will be willing or able to accommodate another shift of the trial date – particularly one that would presumably implicate the Christmas holidays), and Class Plaintiffs’ witnesses have been rescheduled for the November 4th trial.

For these reasons, Class Plaintiffs ask that the Court require the parties remaining in the litigation to abide by the current deadlines and that the Court maintain the current November 4th trial setting. We also ask that, regardless of whether the Court adjusts any deadline, that Your Honor make clear that no further request by any party for delay will be granted.

Respectfully submitted,

/s/ Andrew J. Entwistle

/s/ Trig Smith

*Co-Lead Counsel for the Class*